

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

STAVANGER HOLDINGS, LTS and KARL )  
ANDERSEN, )  
                )  
Plaintiffs, )  
                )  
                )  
v. )     CASE NO. 1:12-cv-0646 WTL-MJD  
tranen capital, ltd., tranen capital alternative )  
investment fund, ltd., the leo group, llc, kenneth )  
a. landgaard, arthur l. bowen, AND randy w. )  
bagley, )  
                )  
Defendants. )  
                )  
                )

**DEFENDANTS THE LEO GROUP, LLC AND RANDY W. BAGLEY'S MOTION TO  
DISMISS PLAINTIFFS' COMPLAINT**

Defendants The Leo Group, LLC ("Leo Group") and Randy W. Bagley move to dismiss Plaintiffs' Complaint for failure to state a cognizable claim against them.

Plaintiffs' claim against Leo Group for breach of contract is barred by the Statute of Frauds and Plaintiffs identify no facts -- just naked legal assertions -- to plausibly show, as they must, that Mr. Bagley should be held personally liable for Leo Group's purported breach of contract. For both reasons, as described in Defendants' supporting brief, Plaintiffs' Complaint against Mr. Bagley and Leo Group should be dismissed in its entirety, with prejudice.

/s/ T. Joseph Wendt

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Bagley*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of July, 2012, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ *T. Joseph Wendt*